

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

GUARDIAN INDUSTRIES CORP.,

Plaintiff,

v.

DELL, INC.; GATEWAY, INC.;
HEWLETT-PACKARD COMPANY; ACER INC.;
ACER AMERICA CORPORATION; AOC INTERNATIONAL;
ENVISION PERIPHERALS, INC.; TPV TECHNOLOGY, LTD.;
TPV INTERNATIONAL (USA), INC.;
AU OPTRONICS CORPORATION;
AU OPTRONICS CORPORATION AMERICA a/k/a
AU OPTRONICS AMERICA, INC.;
BENQ CORPORATION; BENQ AMERICA CORPORATION;
CHUNGHWA PICTURE TUBES, LTD. a/k/a
CHUNGHWA PICTURE TUBES COMPANY;
TATUNG COMPANY;
TATUNG COMPANY OF AMERICA, INC.;
BOE HYDIS TECHNOLOGY COMPANY, LTD.;
BOE HYDIS AMERICA INC.; CHI MEI OPTOELECTRONICS;
COMPAL ELECTRONICS, INC.;
HANNSTAR DISPLAY CORPORATION; JEAN CO., LTD.;
LITE-ON TECHNOLOGY CORPORATION;
LITE-ON, INC. a/k/a LITEON TRADING USA, INC.;
MAG TECHNOLOGY COMPANY, LTD.;
MAG TECHNOLOGY USA, INC.;
PROVIEW INTERNATIONAL HOLDINGS, LTD.;
PROVIEW TECHNOLOGY, INC.;
PROVIEW ELECTRONICS COMPANY, LTD.; and
QUANTA DISPLAY, INC.

Defendants.

Case No.: 05-27-SLR

Jury Trial Demanded

DECLARATION OF MIKE P. LEE IN SUPPORT OF MOTION TO STAY

I, Mike P. Lee, declare as follows:

1. I have been continuously employed by Tatung Company of America, Inc. ("Tatung America"), since 1984. I am currently the Vice President. As part of my responsibilities, I have knowledge of Tatung America's television and computer monitor products, and I have access to documents concerning that topic.

2. Although televisions and computer monitors sold by Tatung America contain liquid crystal display ("LCD") modules, Tatung America does not, nor has it ever, manufactured or designed LCD modules. Instead, Tatung America purchases and sells television and computer monitors manufactured by others.

3. All televisions or computer monitors sold by Tatung America contain LCD modules that were manufactured by Chunghwa Picture Tubes, Ltd., a defendant named above in the caption of this litigation.

4. Because Tatung America purchases complete televisions or computer monitors, it does not need to know the performance characteristics of the underlying components. Tatung America has virtually no information regarding the components that comprise the LCD panels contained in the modules that it purchases, the arrangement of those components in the panels, nor the specific performance characteristics of those components.

5. I have reviewed the First Amended Complaint filed by plaintiff and, specifically, paragraph 43, which states, "On information and belief, Defendants each sell LCD product(s) that include a version of Fuji Wide View (WV) film." However, Tatung America does not know, and does not have a need to know, the technical details such as which films, if any, are contained in the LCD panels of the products it sells.

6. I declare the foregoing to be true and correct under the penalty of perjury under the laws of the United States, and that this declaration was executed on June 13, 2005 in California.

Miha Lee

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2005 I electronically filed the foregoing with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following and which has also been served as noted:

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I hereby certify that on June 14, 2005 the foregoing documents were sent to the following non-registered participants in the manner indicated:

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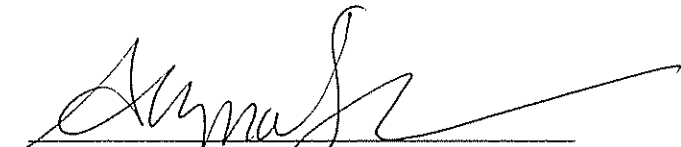
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